

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)
)
)

THIS DOCUMENT RELATES TO:
ALL CASES

) **DECLARATION OF SOLOMON B.**
) **CERA IN SUPPORT OF LEAD**
) **PLAINTIFF'S UNOPPOSED MOTION**
) **FOR EXTENSION OF TIME TO FILE**
) **PAPERS IN OPPOSITION TO**
) **DEFENDANTS' MOTIONS TO DISMISS**
)

I, Solomon B. Cera, declare:

1. I am a partner of Gold Bennett Cera & Sidener LLP, counsel for lead plaintiff BPI Global Asset Management LLP. I submit this declaration in support of the unopposed motion for an extension of time to file papers in opposition to defendants' motions to dismiss to and including March 22, 2005. The matters stated herein are true of my own personal knowledge and, if called to testify thereto, I could and would competently do so.

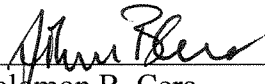
2. I have conferred and reached agreement with defendants' counsel regarding an appropriate schedule for briefing on defendants' motions to dismiss. That proposed schedule is reflected in the Joint Scheduling Proposal, lodged January 28, 2005. It provides for opposition papers to be filed March 22, 2005 and reply papers on April 21, 2005.

3. On February 8, 2005, I made an inquiry of the Courtroom Clerk as to the status of the Joint Scheduling Proposal, lodged January 28, 2005. That same day I received an e-mail response from the Courtroom Clerk stating that the proposal would be adopted as an order of the

Court. Because no order has been received as of the time of submission of this motion on February 11, 2005 (the due date for opposition briefs under LR, D. Mass. 7.1(b)(2)), this application is being submitted in an abundance of caution.

4. Lead Plaintiff's counsel is working diligently and in good faith to prepare oppositions to defendants' lengthy and complex motions to dismiss, but nonetheless requires the requested extension. Lead Plaintiff will not seek any further extensions to file papers in opposition to defendants' motions to dismiss.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of February 2005 at San Francisco, California.



Solomon B. Cera